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**From:** Steib, Clovis [steib.clovis@epa.gov]  
**Sent:** 10/31/2018 3:39:56 PM  
**To:** Madden, Joshua [madden.joshua@epa.gov]  
**CC:** Verhalen, Frances [verhalen.frances@epa.gov]  
**Subject:** RE: Air Division Directors Meeting Agenda

Please post to the SharePoint site.

I am only checking emails periodically during the breaks in the ELMS Deployment training and will not be able to upload this to the SharePoint site for you this week.

Thanks.  
---Clovis

***Clovis Steib, III***

Air Planning Section  
U.S. EPA Region 6, 6MM-AA  
Phone: 214-665-7566  
[Steib.Clovis@epa.gov](mailto:Steib.Clovis@epa.gov)

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**From:** Madden, Joshua  
**Sent:** Wednesday, October 31, 2018 7:30 AM  
**To:** Steib, Clovis <steib.clovis@epa.gov>  
**Subject:** Air Division Directors Meeting Agenda

Clovis,

I know that Cindy has been in contact with you a little bit about this, but with her being out most of this week I would like to know what do to with the information that we gathered for Wren's meeting. This is what we have:

**Thursday, November 8, 2018**

9:30 – 11:00	<b>Risk Communication and Update on EtO (90 mins)</b>	Ed Nam (R5) Wren Stenger (R6) Mike Koerber (OAQPS)	<ul style="list-style-type: none"><li>• Learning from past experiences with Denka and EtO</li><li>• Next steps</li></ul>
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NATA Update - National-scale Air Toxics Assessment was released to public on August 22, 2018

Region 6 EtO facilities with cancer risk greater than 10<sup>-4</sup>:

2014 NATA Facilities Greater than 10-4		
Facility	State	CITY
Union Carbide Corp - St Charles Operations (Dow Chem.)	LA	Taft
BCP Ingredients Inc (Balchem Co.)	LA	St. Gabriel
Air Products Performance Manufacturing Inc - Reserve Plant	LA	Reserve
Sasol Chemicals (USA) LLC - Lake Charles Chemical Complex	LA	Westlake
Taminco US Inc (Eastman Chemical Co.)	LA	St. Gabriel
Denka	LA	Laplace
Santa Teresa Facility (Sterigenics)	NM	Santa Teresa
Port Neches Plant ( Huntsman Corp.)	TX	Port Neches
Texas Operations (Eastman Chemical Co.)	TX	Longview
Midwest Sterilization Corp	TX	Laredo
Shell Technology Center Houston	TX	Houston

TOPIC: Denka Briefing for Fall 2018 ADD

DATE: Oct.25, 2018

CONTACT: Joshua Madden (5-7151)

PURPOSE: Information on Denka for Fall 2018 ADD

DEADLINE DATE: Oct. 31, 2018

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**BACKGROUND:**

EPA's 2014 National Air Toxics Assessment (NATA), released in August 2018, showed estimated lifetime cancer risks in LaPlace LA of 2,000-in-1 million. EPA has an upper limit of acceptable risk of approximately 100-in-1 million. The elevated risk in LaPlace appears to be from chloroprene emissions from the Denka Performance Elastomer, LLC facility (Denka) and ethylene oxide emissions from Union Carbide and Air Liquide in Reserve, LA.

**CURRENT STATUS:**

EPA continues to monitor ambient air for chloroprene at six locations every three days in LaPlace. In December 2017, DPE completed installation of a regenerative thermal oxidizer, two condensers, and equipment upgrades and controls for vents and fugitive emissions to reduce emissions of chloroprene. Denka estimated that the controls reduced emissions by 85%. Since March 2018, air sampling results have shown a substantial reduction in chloroprene emissions from all monitoring locations. Beginning in March 2019, the frequency of sample collection will become once every six days and sampling will continue through the end of December 2019. Modeling shows that this schedule will be adequate to monitor chloroprene emissions.

The next potential compliance action includes air sampling in Denka's process area with automated samplers. These sampling stations inside the fence line have the potential to identify areas within the plant that cause emissions that would impact the surrounding community.

**ENVIRONMENTAL/PUBLIC HEALTH CONCERNS:**

Chloroprene is a likely carcinogen, with projected rate of cancer increase when concentrations exceed 0.2 ug/m<sup>3</sup> on a continuous basis for lifetime exposure. Chloroprene has a projected non-cancer lifetime exposure rate increase when concentrations exceed 20 ug/m<sup>3</sup> on a continuous basis.

**TECHNICAL CONCERNS:**

Meteorology, emission sources and rates influence chloroprene concentrations shown in the data.

Because of seasonal weather variabilities and Denka's variable production rates, at this time EPA does not have sufficient data to provide definitive analysis and evaluation of emission trends.

**REGULATORY/LEGAL REQUIREMENTS:**

EPA's IRIS upper risk estimate for chloroprene for an increased cancer risk of 100 in 1 million is 0.2 ug/m<sup>3</sup> (lifetime exposure).

**COMMUNITY CONCERNS:**

Current emissions exceed EPA's IRIS value of 0.2 ug/m<sup>3</sup>; exceedances are point in time concentration and not especially a lifetime exposure concentration.

Denka's agreement with LDEQ to reduce chloroprene emissions by 85% from their 2014 NEI does not reach a modeled emission of 0.2 ug/m<sup>3</sup>.

Cindy mentioned a sharepoint site to post to, but I never received a link from here. Let me know what I can do to get this information to the right spot. Thanks!

*Joshua Madden*

Life Scientist

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